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Attorneys for Defendants
ABALANCE CORPORATION, WWB
CORPORATION, FUJI SOLAR CO., LTD.,
VIETNAM SUNERGY JOINT STOCK
COMPANY, VIETNAM SUNERGY (BAC
NINH) COMPANY LIMITED, VSUN
SOLAR USA INC., TOYO CO., LTD.,
and TOYO SOLAR COMPANY LIMITED
F/K/A VIETNAM SUNERGY CELL COMPANY LTD.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

SHANGHAI JINKO GREEN ENERGY
ENTERPRISE MANAGEMENT CO., LTD. and
ZHEJIANG JINKO SOLAR CO., LTD.,

Plaintiffs,

vs.

ABALANCE CORPORATION, WWB
CORPORATION, FUJI SOLAR CO., LTD.,
VIETNAM SUNERGY JOINT STOCK
COMPANY, VIETNAM SUNERGY (BAC
NINH) COMPANY LIMITED, VSUN SOLAR
USA INC., TOYO CO., LTD., and VIETNAM
SUNERGY CELL COMPANY LTD.,

Defendants.

Case No. 3:24-cv-08828-JSC

**DECLARATION OF IRENE YANG IN
SUPPORT OF DEFENDANTS ABALANCE
CORP., WWB CORP., AND FUJI SOLAR
CO., LTD.'S MOTION TO DISMISS (1)
FOR LACK OF PERSONAL
JURISDICTION UNDER FED. R. CIV. P.
12(b)(2) AND (2) FAILURE TO STATE A
CLAIM UNDER FED. R. CIV. P. 12(b)(6)**

Date: May 22, 2025
Time: 10:00 a.m.
Dept.: Courtroom 8—19th Floor
Judge: Honorable Jacqueline Scott Corley

1 I, Irene Yang, declare as follows:

2 1. I am an attorney with the law firm of Sidley Austin LLP and counsel of record for
3 Defendants Abalance Corporation (“Abalance”), WWB Corporation (“WWB”), and Fuji Solar
4 Co., Ltd. (“Fuji”) in the above-captioned matter.

5 2. I make this declaration in support of Defendants Abalance, WWB, and Fuji’s
6 Motion to Dismiss for (1) Lack of Personal Jurisdiction Under Fed. R. Civ. P. 12(b)(2) and (2)
7 Failure to State a Claim under Fed. R. Civ. P. 12(b)(6). I have personal knowledge of the facts set
8 forth in this declaration and am competent to testify as to all matters stated herein.

9 3. Attached as **Exhibit 1** is a true and correct copy of S&P Capital IQ’s public
10 company profile for Abalance, captured on April 10, 2025.

11 4. Attached as **Exhibit 2** is a true and correct copy of Abalance’s company profile
12 from Abalance’s website (<https://www.abalance.jp/en/aboutus/abalance>), last visited on April 16,
13 2025.

14 5. Attached as **Exhibit 3** is a true and correct copy of S&P Capital IQ’s private
15 company profile for WWB, captured on April 10, 2025.

16 6. Attached as **Exhibit 4** is a true and correct copy of WWB’s company profile from
17 WWB’s website (<https://wwwb.jp/company/outline>), last visited on April 10, 2025.

18 7. Attached as **Exhibit 5** is a true and correct copy of S&P Capital IQ’s private
19 company profile for Fuji, captured on April 10, 2025.

20 8. Attached as **Exhibit 6** is a true and correct copy of Fuji’s company profile from
21 Abalance’s website (<https://www.abalance.jp/en/aboutus/fujisolar/>), last visited on April 16, 2025.

22 9. Attached as **Exhibit 7** is a true and correct copy of Abalance’s “Our Business”
23 webpage on Abalance’s website (<https://www.abalance.jp/en/business/#energy>), last visited on
24 April 16, 2025.

25 I declare under penalty of perjury, under the laws of the State of California, that the
26 foregoing is true and correct.
27
28

Executed this 16th day of April, 2025, at San Francisco, California.

/s/ Irene Yang
Irene Yang